— Sent via fax and mail & email —

NOV 20 2001

Via Facsimile and Mail

Gwen B. Zervas, P.E.
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401 East State Street
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Re: Review of the *Workplan to Evaluated Free Product Remedial Strategies,* L.E. Carpenter, Wharton, New Jersey.

As we discussed over the telephone today, the U. S. Environmental Protection Agency (EPA) has reviewed the above referenced work plan, and is pleased to provide the following comments for your consideration:

1. Page 2-1: The text states that soils "suspected of lead contamination" will be stockpiled. How is this to be determined? Similarly soils "potentially contaminated with DEHP and BTEX" will be placed on the bench. Is this to be done by simple visual inspection (ie. Whether product is visible)? In addition, does this procedure introduce the possibility of spreading contamination to the bench area, or is it presumed that that depth will already be contaminated? Finally, as we discussed, it is recommended that it would be more conservative to place the soils on a plastic liner to ensure that contamination is not inadvertently spread.

2. Page 2-2, Task 2: If the test pits are to be backfilled with washed stone, what will happen to the contaminated soils? Will the soils be shipped off-site as IDW, or will they simply be left on site, or backfilled? The disposition of these soils should be addressed in the work plan.

3. Page 2-2, Task 2: Product thicknesses in the proposed recovery wells may not be representative of the effect of trenches, which would presumably use horizontal piping. How will the final report of the pilot testing field results handle this issue.

4. Page 2-2, Task 3: The text states that sampling for metals "may be necessary." How will this be determined? As mentioned over the telephone, we believe that the testing for RCRA metals should be a required part of the work plan.

5. Page 2-2, Task 3: The text gives very little detail on the bench scale study. Typically, work plans of this sort give more information about the testing apparatus and specific analysis methods. In addition, it should be clear what parameters will be monitored by the Combustible Emissions Monitor (CEB). Will the CEB give constant minimum readings below the appropriate safety and emissions criteria, or will measurements be taken at certain intervals? At what temperature(s) will the bench tests be run? For a number of reasons, the work plan should provide a full description of what is intended and expected, both from a regulatory point of view, and because it is important that all parties agree on these specifics beforehand, in an effort to maximize time and get everyone's buy in on the goals and results.

6. Page 2-3, Task 3: The text needs to be clearer about what other technologies would be evaluated and how. If this would be the subject of a work plan addendum, it would be sufficient to note this.

7. Page 2-3, Task 4: In a number of places, the text states that "up to 3" samples will be collected. What will determine the number of samples? At a minimum, we recommend that 3 samples be taken.

8. As we discussed, a project specific Health and Safety Plan must be submitted and in place before field work begins. In addition, as we discussed, the original Health and Safety plan should be updated, if needed, and submitted.

9. The final version of the work plan should provide a detailed schedule outlining key activities and anticipated completion dates.

Again, thank you for providing us with this opportunity to review and comment on the above work plan. If you have any questions or comments on the above, please contact me at (212) 637-4411.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

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